

1 MICHAEL STEPANIAN  
2 Attorney at Law (CSBN 037712)  
3 819 Eddy Street  
4 San Francisco, CA 94109  
5 Telephone: (415) 771-6174  
6 Facsimile: (415) 474-3748

7 Attorney for Defendant  
8 DONIEL NUNN

9  
10  
11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 ooo

14 UNITED STATES OF AMERICA,

15 Plaintiff, CR. 07-0103-WHA

16 vs.

17 DONIEL NUNN,

18 Defendant.

19  
20 STIPULATION TO CONTINUE  
21 DATE FOR STATUS CONFERENCE

22  
23  
24 Defendant DONIEL NUNN, by and through his counsel Michael Stepanian, and  
25 Assistant United States Attorney Andrew P. Caputo hereby stipulate and agree that the  
26 status conference presently set for July 3, 2007, be continued to July 24, 2007 at 2:00 p.m..  
27 This continuance is at the request of defense counsel who was appointed by the Court on  
28 June 25, 2007 and needs sufficient time to review the discovery and to then meet and  
confer with his client.

29  
30 The time period from June 25, 2007 to July 24, 2007, would be deemed excludable  
31 pursuant to 18 U.S.C. Section 3161(h)(8)(A), given that the ends of justice served by  
32 granting a continuance outweigh the best interests of the public and of the defendant in a  
33 speedy trial. Additionally, pursuant to 18 U.S.C. Section 3161(h)(8)(B)(ii) given the

1 fact that defense counsel was appointed on June 25, 2007 and did not receive the  
2 discovery until June 27, 2007, it is unreasonable to expect adequate preparation for trial  
3 proceedings within the limits established by the Speedy Trial Act.

4

5 Date: June 28, 2007

/s/ Michael Stepanian  
MICHAEL STEPANIAN  
Counsel for Defendant  
DONIEL NUNN

6

7 Date: June 28, 2007

8 /s/ Andrew P. Caputo  
9 ANDREW P. CAPUTO  
Assistant United States Attorney

10 SO ORDERED:

11 July 2

12 \_\_\_\_\_, 2007

13   
WILLIAM H. ALSUP  
United States District Court Judge

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28